

THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

UNITED STATES OF AMERICA,	:	
Plaintiff,	:	
	:	CIVIL ACTION
v.	:	
	:	NO.
\$38,400 IN UNITED STATES	:	
CURRENCY,	:	
Defendant.	:	

**COMPLAINT FOR FORFEITURE**

COMES NOW, the United States of America, and files this Complaint for Forfeiture, showing the Court as follows:

1. The Court has jurisdiction over this case pursuant to 28 U.S.C. §§ 1345 and 1355.
2. Venue is proper in this Court pursuant to 28 U.S.C. §§ 1355 and 1391.
3. On July 11, 2013, agents of the Drug Enforcement Administration and the United States Postal Inspection Service seized \$38,400.00 in United States Currency (collectively, the "Defendant Property").
4. The Defendant Property was seized during the execution of a search warrant on a safe deposit box at the Wells Fargo Bank branch located at 2942 North Druid Hills Road, Atlanta, Georgia, a place within the jurisdiction and venue of this Court.

5. The Defendant Property was seized as proceeds of illegal drug distribution.
6. 21 U.S.C. § 841 makes it unlawful “to manufacture, distribute, or dispense, or possess with intent to manufacture, distribute, or dispense, a controlled substance.”
7. Under 21 U.S.C. § 881(a)(6), “[a]ll proceeds traceable to [an exchange for a controlled substance in violation of this subchapter]” shall be subject to forfeiture to the United States.
8. 21 U.S.C. § 841 and 21 U.S.C. § 881 fall within Subchapter I-Control and Enforcement under Title 21 and Chapter 13 of the United States Code.
9. On June 25, 2013, agents with HIDTA, a multi-agency federal law enforcement task force, acting on information from law enforcement agents in Israel, conducted surveillance of the residence of Christopher John Coleman, located at 1471 Wembley Court, NE, Atlanta, Georgia.
10. The Israeli agents had developed evidence that several packages, originating from Atlanta and containing the controlled substances GHB and methamphetamine, had been sent by Coleman.

11. Agents observed Coleman drive to the United States Post Office located at 1799 Briarcliff Road in Atlanta, enter the post office carrying a package, and mail the package.
12. After Coleman left the post office, agents obtained a search warrant for the package that Coleman mailed. Upon executing the warrant, agents opened the package and seized 12.9 grams of a substance, later tested and confirmed to be methamphetamine.
13. On July 8, 2013, Coleman told an undercover agent that he had recently mailed a package containing 28 grams of methamphetamine, for which he had been paid \$2,000.00 via Western Union.
14. Agents located this package at the U.S. Post Office located at 455 Moreland Avenue, Atlanta, Georgia.
15. On July 9, 2013, agents executed a search warrant on this package.
16. The package bore a return address for M. Thelen at 1471 Wembley Court, Atlanta, Georgia, and was addressed to D. Eldar, P.O. Box 7190, Holm, Israel, 58361.
17. Inside the package, agents found a greeting card made out to "David" and several bags of candy.

18. One of bags of candy had been cut open, and inside the bag, agents located a small, clear ziplock bag containing 28.2 grams of methamphetamine.
19. On the same day that they seized the 28.2 grams of methamphetamine, agents saw Coleman visit the Wells Fargo Bank branch at 2492 North Druid Hills Road in Atlanta.
20. On July 10, 2013, agents executed a search warrant at Coleman's residence at 1471 Wembley Court in Atlanta.
21. Inside Coleman's residence, agents located numerous un-used U.S. Postal Service mailing labels, three express mail receipts, including a receipt for the package mailed on June 25, 2013, a customs declarations receipt, packages of candy similar to those found in the Israel-bound box, FedEx receipts, and other documents.
22. Agents also recovered an eye dropper containing the controlled substance 1,4 Butanediol (a controlled substance popular as a recreational drug and similar to GHB) and two plastic baggies containing 6.2 grams of cocaine from a jacket in Coleman's closet; plastic bottles containing the controlled substance Ketamine; and a

sandwich bag labeled "empty capsules & Mollie & Xtacy," containing empty gelatin capsules.

23. On July 11, 2013, agents executed a search warrant on Coleman's safety deposit box at the Wells Fargo Bank located at 2942 Druid Hills Road in Atlanta.
24. Inside box number 20320, agents located 18 white envelopes marked with either "1K," "2K," or "4K," corresponding to the amount of currency the enveloped contained.
25. Agents seized a total of \$38,400.00 in United States Currency from the safety deposit box; the \$38,400.00 composes the Defendant Property.
26. Coleman is the sole signatory on safety deposit box number 20320.
27. At the time of the events described herein, Coleman was the sole occupant of 1471 Wembley Court.
28. The Georgia Department of Labor shows no employment history for Coleman.
29. Coleman stated that he works as an event planner.
30. Based on the foregoing, the United States submits that the Defendant Property is subject to forfeiture pursuant to 18 U.S.C. § 881(a)(6) as proceeds traceable to an exchange for a controlled substance.

WHEREFORE, the United States prays that:

- 1) The Court forfeit the Defendant Property to the United States of America;
- 2) The Court award Plaintiff the costs of this action; and
- 3) The Court grant such other relief as the Court deems just and proper under the facts and circumstances of this case.

This 24th day of December, 2013.

Respectfully submitted,

SALLY QUILLIAN YATES  
UNITED STATES ATTORNEY

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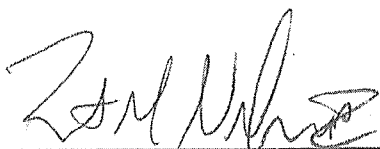
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VERIFICATION OF COMPLAINT FOR FORFEITURE

I, Robert Norton, of the Drug Enforcement Administration, have read the Complaint for Forfeiture in this action and state that its contents are true and correct to the best of my knowledge and belief based upon my personal knowledge of the case and upon information obtained from other law enforcement personnel.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

This 27 day of DECEMBER, 2013.

  
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SPECIAL AGENT ROBERT NORTON  
DRUG ENFORCEMENT  
ADMINISTRATION